

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-mc-00353-LJL

**NOTICE OF MOTION BY RUBY FREEMAN AND WANDREA' MOSS  
TO ENFORCE JUDGMENT**

PLEASE TAKE NOTICE, that Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs"), pursuant to New York Civil Practice Law and Rules § 5225 and § 5228, Fed. R. Civ. P. 69, and upon the memorandum in support of this motion and supporting papers, move this Court for entry of the proposed order requiring Defendant Rudolph W. Giuliani to deliver to Plaintiffs the specific personal property in his possession listed in the proposed order and memorandum, and appointing Plaintiffs as receivers of certain specific property listed in the proposed order and memorandum.

Dated: August 30, 2024  
New York, New York

John Langford  
Rachel Goodman  
United to Protect Democracy  
82 Nassau Street, #601  
New York, NY 10038  
(202) 579-4582  
john.langford@protectdemocracy.org  
rachel.goodman@protectdemocracy.org

Christine Kwon  
(*pro hac vice forthcoming*)  
P.O. Box 341423  
Los Angeles, CA 90034-9998  
(202) 579-4582  
christine.kwon@protectdemocracy.org

Von DuBose (*pro hac vice forthcoming*)  
DuBose Miller LLC  
75 14th Street NE. Suite 2110  
Atlanta, GA 30309  
(404) 720-8111  
dubose@dubosemiller.com

Respectfully submitted,

/s/ Aaron E. Nathan

Michael J. Gottlieb  
Meryl C. Governski (admitted *pro hac vice*)  
Willkie Farr & Gallagher LLP  
1875 K Street NW  
Washington, DC 20006  
(202) 303-1000  
mgottlieb@willkie.com  
mgovernski@willkie.com

Aaron E. Nathan  
M. Annie Houghton-Larsen  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, NY 10019  
(212) 728-8000  
anathan@willkie.com  
mhoughtonlarsen@willkie.com

*Attorneys for Plaintiffs Ruby Freeman and Wandrea' Moss*